

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Taylor K. Repine

Debtor

Chapter 13

BR No: 22-10631-mdc

DEBTOR, TAYLOR K. REPINE. RESPONSE TO NATIONSTARS MORTGAGE, LLC D/B/A/MR. COOPER'S MOTION FOR IN REM RELIEF FROM THE AUTOMATIC STAY.

1. Admitted.
2. Admitted.
3. Admitted upon information and belief.
4. Admitted.
5. Admitted in part. Denied in part. It is admitted that Debtor, Taylor K. Repine, filed nine bankruptcy petitions. It is specifically denied that any of the nine petitions were filed in an attempt to hinder or delay the creditor, Nationstar Mortgage, LLC. By way of further response, the first six filings of Debtor, Taylor K. Repine, were filed pro se, and were essentially filed in monthly succession from July 2017 to February 2018.
6. Denied. It is specifically denied that Debtor, Taylor K. Repine, bankruptcy filings were intended to hinder, delay, or defraud the movant. As stated above, the first six petitions were filed in essentially monthly sequence by the debtor, pro se. Following the next dismissal, the Debtor, Taylor K. Repine, was subject to a 24-month Bar order. Once the 24-month Bar order was served, Debtor, Taylor K. Repine filed an eight petition which was dismissed in-as-much as the Debtor, Taylor K. Repine, underwent brain surgery in Pittsburg, PA for a condition known as Chiari malformation.
7. Admitted. It is admitted that Exhibit C so indicates.

8 – 13. Admitted. As so indicated above, it is admitted that Debtor, Taylor K. Repine, filed essentially six consecutive bankruptcy petitions pro se.

14. Admitted. By way of further answer, Debtor Taylor K. Repine, was subject to a 24-month Bar Order. See March 7, 2019, Bar Order attached.

15. Admitted. By way of further response, Debtor, Taylor K. Repine, had undergone brain surgery in Pittsburgh, PA for a condition known as Chiari malformation.

16. Denied. Debtor, Taylor K. Repine, bankruptcy filings were not flagrant. By way of further response, seven of Debtor, Taylor K. Repine, filings resulted in a 24-month Bar Order while the eight was dismissed due too a serious medical condition.

17. Admitted.

18. Denied. Under the special circumstances stated within, in rem relief from the stay for cause is not warranted.

19-24. Admitted upon information and belief. By way of further response, Debtor, Taylor K. Repine, has and/or will make current her post-petition arrearages.

25. Denied. Debtor, Taylor K. Repine, has and/or will provide adequate protection for the creditor's interest. By way of further response, Debtor, Taylor K. Repine, and Creditor Mr. Cooper are in an ongoing application for loan modification.

26. Denied.

27. Admitted. It is admitted upon information and belief that the documents are what they purport to be.

WHEREFORE, Respondent, Taylor K. Repine, respectfully requests this Honorable Court to deny Movant's Motion for In Rem Relief from the Automatic Stay.

July 25, 2022

/s/ Michael T. Malarick, Esquire
Attorney for Debtor, Taylor K. Repine
2211 Chichester Avenue, Suite 201
Boothwyn, PA 19061
P: 610-715-9960
F: 610-561-5967
E: michael@malaricklaw.com